

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

United States of America
ex rel. ALEX DOE, Relator,

The State of Texas
ex rel. ALEX DOE, Relator,

The State of Louisiana
ex rel. ALEX DOE, Relator,
Plaintiffs,

v.

Planned Parenthood Federation of America, Inc.,
Planned Parenthood Gulf Coast, Inc., Planned
Parenthood of Greater Texas, Inc., Planned
Parenthood South Texas, Inc., Planned Parenthood
Cameron County, Inc., Planned Parenthood San
Antonio, Inc.,

Defendants.

CIVIL ACTION NO. 2:21-CV-
00022-Z

Date: December 5, 2022

**APPENDIX IN SUPPORT OF DEFENDANTS' OPPOSITION TO RELATOR'S
JOINDER IN LOUISIANA'S MOTION FOR PROTECTIVE ORDER**

ARNOLD & PORTER KAYE SCHOLER LLP

Tirzah S. Lollar
Tirzah.Lollar@arnoldporter.com
601 Massachusetts Ave, NW
Washington, DC 20001-3743
Telephone: +1 202.942.5000
Fax: +1 202.942.5999

EX. NO.	DOCUMENT NAME	APP. PAGE NO.
1.	10/31/2022 Email from T. Lollar to R. Winter and A. Stephens	App. 001 - App. 073
2.	10/25/2022 Plaintiffs' Amended Notice of Deposition of Tamara Kramer	App. 074 - App. 076

Exhibit 01

From: Lollar, Tirzah
Sent: Monday, October 31, 2022 5:59 PM
To: Raymond Winter; zzz.External.dashby@omm.com; Andrew Stephens
Cc: Amy Hilton; Heather Hacker; Margolis, Craig D.; Odell, Christopher M.; zzz.External.lgodesky@omm.com; zzz.External.jchapa@omm.com; zzz.External.asantella@omm.com; Reeder-Ricchetti, Emily; Pieper, Megan; Martin, Meghan C.; Gerstner, Alyssa; zzz.External.rgalin@omm.com; Ramer, Paula; Eugenia Krieg; Jennifer Rowell; Amanda Byrd; Michael Moore; Drew Wright; Sinty Chandy
Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z
Attachments: 2022-10-31 Defendants Notice of Deposition D. Lochabay.pdf; 2022-10-31 Defendants Notice of Deposition D. Maxwell.pdf; 2022-10-31 Defendants Notice of Deposition K. Ghahremani.pdf; 2022-10-31 Defendants Notice of Deposition K. Sullivan.pdf; 2022-10-31 Defendants Notice of Deposition Relator.pdf; 2022-10-31 Defendants Notice of Deposition S. Bowen.pdf; 2022-10-31 Defendants Notice of Deposition S. Russo.pdf; 2022-10-31 Defendants Notice of Deposition T. Spears.pdf; 2022-10-31 Defendants Notice of 30b6 Deposition of LDH.pdf

Ray and Andrew:

Attached find deposition notices for the witnesses we have discussed with you, as well as some additional witnesses. We are willing to meet and confer regarding the dates.

Ray, please also let us know if you are authorized to accept a subpoena for Bowen.

Thanks,
Tirzah

Tirzah Lollar

Partner | [Bio](#)

Arnold & Porter

601 Massachusetts Ave., NW

Washington, DC 20001-3743

T: +1 202.942.6199

Tirzah.Lollar@arnoldporter.com

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From: Raymond Winter <Raymond.Winter@oag.texas.gov>
Sent: Monday, October 31, 2022 11:51 AM
To: zzz.External.dashby@omm.com <dashby@omm.com>; Andrew Stephens <andrew@hackerstephens.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>
Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; zzz.External.lgodesky@omm.com <lgodesky@omm.com>; zzz.External.jchapa@omm.com <jchapa@omm.com>; zzz.External.asantella@omm.com <asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; zzz.External.rgalin@omm.com <rgalin@omm.com>; Ramer, Paula <Paula.Ramer@arnoldporter.com>; Eugenia Krieg <Eugenia.Krieg@oag.texas.gov>; Jennifer Rowell <Jennifer.Rowell@oag.texas.gov>; Amanda Byrd <Amanda.Byrd@oag.texas.gov>; Michael Moore <Michael.Moore@oag.texas.gov>; Drew Wright

<Drew.Wright@oag.texas.gov>; Sinty Chandy <Sinty.Chandy@oag.texas.gov>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

Received. Thanks Danny.

Raymond Charles Winter
Assistant Attorney General
Chief, Civil Medicaid Fraud Division
PO Box 12548
Austin, Texas 78711-2548
(512) 936-1709
(512) 370-9477 Fax
(512) 542-4342 Cell
(512) 554-5692 Other cell
Raymond.winter@oag.texas.gov

From: Ashby, Danny S. <dashby@omm.com>

Sent: Monday, October 31, 2022 10:36

To: Raymond Winter <Raymond.Winter@oag.texas.gov>; Andrew Stephens <andrew@hackerstephens.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Godesky, Leah <lgodesky@omm.com>; Chapa, Justin R. <jchapa@omm.com>; Santella, Amanda M. <asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; Galin, Ross B. <rgalin@omm.com>; Ramer, Paula <Paula.Ramer@arnoldporter.com>; Eugenia Krieg <Eugenia.Krieg@oag.texas.gov>; Jennifer Rowell <Jennifer.Rowell@oag.texas.gov>; Amanda Byrd <Amanda.Byrd@oag.texas.gov>; Michael Moore <Michael.Moore@oag.texas.gov>; Drew Wright <Drew.Wright@oag.texas.gov>; Sinty Chandy <Sinty.Chandy@oag.texas.gov>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Hi Ray and Andrew -

I'm also confirming per our call Friday that we will present Louis Dudney and Tamara Kramer at Arnold & Porter's offices in Chicago and that new notices are not needed for the change in location. Let us know if you have any questions. Thanks.

Danny

Danny S. Ashby
O: +1-972-360-1904
M: +1-214-577-9886

From: Raymond Winter <Raymond.Winter@oag.texas.gov>
Sent: Friday, October 28, 2022 1:13 PM
To: Andrew Stephens <andrew@hackerstephens.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Ashby, Danny S. <dashby@omm.com>
Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Godesky, Leah <lgodesky@omm.com>; Chapa, Justin R. <jchapa@omm.com>; Santella, Amanda M. <asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; Galin, Ross B. <rgalin@omm.com>; Ramer, Paula <Paula.Ramer@arnoldporter.com>; Eugenia Krieg <Eugenia.Krieg@oag.texas.gov>; Jennifer Rowell <Jennifer.Rowell@oag.texas.gov>; Amanda Byrd <Amanda.Byrd@oag.texas.gov>; Michael Moore <Michael.Moore@oag.texas.gov>; Drew Wright <Drew.Wright@oag.texas.gov>; Sinty Chandy <Sinty.Chandy@oag.texas.gov>
Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

[EXTERNAL MESSAGE]

thanks

From: Andrew Stephens <andrew@hackerstephens.com>
Sent: Friday, October 28, 2022 13:08
To: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; dashby@omm.com; Raymond Winter <Raymond.Winter@oag.texas.gov>
Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; jchapa@omm.com; asantella@omm.com; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; rgalin@omm.com; Ramer, Paula <Paula.Ramer@arnoldporter.com>
Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Yes, thanks

From: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>
Sent: Friday, October 28, 2022 1:04 PM
To: Andrew Stephens <andrew@hackerstephens.com>; dashby@omm.com; Raymond Winter <Raymond.Winter@oag.texas.gov>
Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; jchapa@omm.com; asantella@omm.com; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; rgalin@omm.com; Ramer, Paula <Paula.Ramer@arnoldporter.com>
Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Andrew and Ray:

Just to confirm what we stated on the phone just now, we are moving the location of the Hons and PPST/PPSA/PPCC 30b6 depositions to Akin Gump's San Antonio office. Affiliates do not need a new notice for the changed date.

112 E. Pecan Street
Suite 1010
San Antonio, TX 78205-1512
sanantonioinfo@akingump.com

T
[+1 210.281.7000](tel:+12102817000)
F
[+1 210.224.2035](tel:+12102242035)

Thanks,
Tirzah

Tirzah Lollar
Partner | [Bio](#)

Arnold & Porter

601 Massachusetts Ave., NW
Washington, DC 20001-3743
T: +1 202.942.6199
Tirzah.Lollar@arnoldporter.com
www.arnoldporter.com | [LinkedIn](#) | [Twitter](#)

From: Andrew Stephens <andrew@hackerstephens.com>

Sent: Thursday, October 27, 2022 4:51 PM

To: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; zzz.External.dashby@omm.com <dashby@omm.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; zzz.External.lgodesky@omm.com <lgodesky@omm.com>; zzz.External.jchapa@omm.com <jchapa@omm.com>; zzz.External.asantella@omm.com <asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; zzz.External.rgalin@omm.com <rgalin@omm.com>; Ramer, Paula <Paula.Ramer@arnoldporter.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

Relator deposition is December 2 and PPGT is December 6 so those dates won't work for Exnicious.

Nov 3: Hons (San Antonio), Kreager Mitchell, 7373 Broadway, San Antonio, TX 78209
Nov 10: Rossiter (DC), Arnold & Porter, 601 Massachusetts Ave., NW Washington, DC 20001
Nov 14: De Jong (Dallas), Office of the Attorney General, 1412 Main Street, Dallas, TX 75202
Nov 15: Trivisonno (Naples FL), 4851 Tamiami Trail North Park Shore, Suite 200, Naples, FL 34103
Nov 16: Exnicious (Houston), Office of the Attorney General, 808 Travis Street, Suite 1520, Houston, TX 77022
Nov 17-18: PPST/PPCC/PPSA (San Antonio) Kreager Mitchell, 7373 Broadway, San Antonio, TX 78209
Nov 21: Lambrecht (Austin), O'Melveny & Meyers, 303 Colorado Street, Suite 2750, Austin, TX 78701
Nov 22: Sokolow (Austin), O'Melveny & Meyers, 303 Colorado Street, Suite 2750, Austin, TX 78701
Nov 22: Linton (Houston), Office of the Attorney General, 808 Travis Street, Suite 1520, Houston, TX 77022

Nov 28: PPFA Custer (DC), O'Melveny & Meyers, 1625 Eye Street, NW Washington, DC 20006

Nov 29: PPFA Barrow-Klein (DC), O'Melveny & Meyers, 1625 Eye Street, NW Washington, DC 20006

Nov 30: Barrow-Klein (DC), O'Melveny & Meyers, 1625 Eye Street, NW Washington, DC 20006

Dec 1: PPGC (Houston), Arnold & Porter, 700 Louisiana Street, Suite 4000, Houston, TX 77002

Dec 2: Relator (Houston), Arnold & Porter, 700 Louisiana Street, Suite 4000, Houston, TX 77002

Dec 5: TX/HHSC 30(b)(6) (Austin), Office of the Attorney General, 300 West 15th Street, Austin, TX 78701

Dec 6: PPGT (Austin), O'Melveny & Meyers, 303 Colorado Street, Suite 2750, Austin, TX 78701

Dec 7: Dudney (Chicago), 8770 West Bryn Mayr Avenue, Suite 1300, Chicago, IL 60631

Dec 8: Kramer (Chicago), 8770 West Bryn Mayr Avenue, Suite 1300, Chicago, IL 60631

Dec 8: Lochabay (Dallas), 2100 Ross Avenue, 21st Floor, Dallas, TX 75201

Dec 9: Collucio (New York), 7 Times Square Tower, New York, NY 10036

Pending dates/locations from PPFA: Stewart, Collucio

Pending dates/locations from PP Affiliates: Linton

Pending dates/locations from TX: TX/HHSC 30(b)(6)

Pending dates/locations from 3rd parties: Maxwell, Spears, De Jong, Exnicious

From: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>

Sent: Thursday, October 27, 2022 12:01 PM

To: Andrew Stephens <andrew@hackerstephens.com>; dashby@omm.com; Raymond Winter <Raymond.Winter@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; jchapa@omm.com; asantella@omm.com; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; rgalin@omm.com; Ramer, Paula <Paula.Ramer@arnoldporter.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Andrew:

Thanks for pulling back the subpoena. Exnicious can be deposed on Dec 2 or 6 in Houston. Can you make either of those work?

Thanks,
Tirzah

Tirzah Lollar
Partner | [Bio](#)

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Washington, DC 20001-3743

T: +1 202.942.6199

Tirzah.Lollar@arnoldporter.com

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From: Andrew Stephens <andrew@hackerstephens.com>

Sent: Wednesday, October 26, 2022 4:39 PM

To: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; zzz.External.dashby@omm.com <dashby@omm.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D.

<Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>;
zzz.External.lgodesky@omm.com <lgodesky@omm.com>; zzz.External.jchapa@omm.com <jchapa@omm.com>;
zzz.External.asantella@omm.com <asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C.
<Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>;
zzz.External.rgalin@omm.com <rgalin@omm.com>; Ramer, Paula <Paula.Ramer@arnoldporter.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

Tirzah, attached is a depo notice instead of subpoena.

Andrew

From: Andrew Stephens

Sent: Wednesday, October 26, 2022 3:32 PM

To: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; dashby@omm.com; Raymond Winter
<Raymond.Winter@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D.
<Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>;
lgodesky@omm.com; jchapa@omm.com; asantella@omm.com; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C.
<Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; rgalin@omm.com;
Ramer, Paula <Paula.Ramer@arnoldporter.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Thanks, Tirzah. No problem re withdrawing the subpoena.

Andrew

From: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>

Sent: Wednesday, October 26, 2022 3:24 PM

To: Andrew Stephens <andrew@hackerstephens.com>; dashby@omm.com; Raymond Winter
<Raymond.Winter@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D.
<Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>;
lgodesky@omm.com; jchapa@omm.com; asantella@omm.com; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C.
<Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; rgalin@omm.com;
Ramer, Paula <Paula.Ramer@arnoldporter.com>

Subject: Re: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Thanks, Andrew. That works. We will send a notice for Relator's depo and for Lochabay on the date Ray proposed.

We were disappointed to learn that Relator may be trying to serve a subpoena on Ronda Exnicious. She is a current employee of PPGC and a subpoena is not necessary or appropriate. We only learned on Monday that Relator would like to depose her and are working hard to propose a date or two as quickly as possible. I should be able to do that if not later today, then tomorrow. We would appreciate you withdrawing any subpoena and instructing the process server to halt efforts to serve her.

Thanks,
Tirzah

From: Andrew Stephens <andrew@hackerstephens.com>
Sent: Wednesday, October 26, 2022 3:14 PM
To: Lollar, Tirzah; zzz.External.dashby@omm.com; Raymond Winter
Cc: Amy Hilton; Heather Hacker; Margolis, Craig D.; Odell, Christopher M.; zzz.External.lgodesky@omm.com; zzz.External.jchapa@omm.com; zzz.External.asantella@omm.com; Reeder-Ricchetti, Emily; Pieper, Megan; Martin, Meghan C.; Gerstner, Alyssa; zzz.External.rgalin@omm.com
Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

Tirzah,

Relator is available in Houston on December 2 at Arnold & Porter office.

Andrew

From: Andrew Stephens
Sent: Tuesday, October 25, 2022 4:14 PM
To: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; dashby@omm.com; Raymond Winter <Raymond.Winter@oag.texas.gov>
Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; jchapa@omm.com; asantella@omm.com; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; rgalin@omm.com
Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Tirzah, Danny,

Please see attached amended deposition notices for the Planned Parenthood witnesses and a notice of subpoenas for Marianne De Jong and Ronda Exnicious. The amended notices and subpoenas should reflect the agreed dates and locations listed below, with open issues highlighted and noted at end.

Relator is available on December 2 and we should have a location to you tonight or first thing tomorrow morning. Per Ray's email, Lochabay is available on December 8 in Dallas at the address listed below. I penciled in TX/HHSC 30(b)(6) on December 5 since that is one of the few remaining open dates, but Texas will need to confirm that date. Tirzah, we also need to discuss Linton.

Andrew

Nov 3: Hons (San Antonio), Kreager Mitchell, 7373 Broadway, San Antonio, TX 78209
Nov 10: Rossiter (DC), Arnold & Porter, 601 Massachusetts Ave., NW Washington, DC 20001
Nov 14: De Jong (Dallas), Office of the Attorney General, 1412 Main Street, Dallas, TX 75202
Nov 15: Trivisonno (Naples FL), 4851 Tamiami Trail North Park Shore, Suite 200, Naples, FL 34103

Nov 16: Exnicious (Houston), Office of the Attorney General, 808 Travis Street, Suite 1520, Houston, TX 77022

Nov 17-18: PPST/PPCC/PPSA (San Antonio) Kreager Mitchell, 7373 Broadway, San Antonio, TX 78209

Nov 21: Lambrecht (Austin), O'Melveny & Meyers, 303 Colorado Street, Suite 2750, Austin, TX 78701

Nov 22: Sokolow (Austin), O'Melveny & Meyers, 303 Colorado Street, Suite 2750, Austin, TX 78701

Nov 22: Linton (Houston), Office of the Attorney General, 808 Travis Street, Suite 1520, Houston, TX 77022

Nov 28: PPFA Custer (DC), O'Melveny & Meyers, 1625 Eye Street, NW Washington, DC 20006

Nov 29: PPFA Barrow-Klein (DC), O'Melveny & Meyers, 1625 Eye Street, NW Washington, DC 20006

Nov 30: Barrow-Klein (DC), O'Melveny & Meyers, 1625 Eye Street, NW Washington, DC 20006

Dec 1: PPGC (Houston), Arnold & Porter, 700 Louisiana Street, Suite 4000, Houston, TX 77002

Dec 2: Relator (Houston), Arnold & Porter, 700 Louisiana Street, Suite 4000, Houston, TX 77002

Dec 5: TX/HHSC 30(b)(6) (Austin), Office of the Attorney General, 300 West 15th Street, Austin, TX 78701

Dec 6: PPGT (Austin), O'Melveny & Meyers, 303 Colorado Street, Suite 2750, Austin, TX 78701

Dec 7: Dudney (Chicago), 8770 West Bryn Mayr Avenue, Suite 1300, Chicago, IL 60631

Dec 8: Kramer (Chicago), 8770 West Bryn Mayr Avenue, Suite 1300, Chicago, IL 60631

Dec 8: Lochabay (Dallas), 2100 Ross Avenue, 21st Floor, Dallas, TX 75201

Dec 9: Collucio (New York), 7 Times Square Tower, New York, NY 10036

Pending dates/locations from PPFA: Stewart, Collucio

Pending dates/locations from PP Affiliates: Linton

Pending dates/locations from TX: TX/HHSC 30(b)(6)

Pending dates/locations from 3rd parties: Maxwell, Spears, De Jong, Exnicious

From: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>

Sent: Monday, October 24, 2022 7:25 PM

To: Andrew Stephens <andrew@hackerstephens.com>; dashby@omm.com; Raymond Winter <Raymond.Winter@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; jchapa@omm.com; asantella@omm.com; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; rgalin@omm.com

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Andrew and Heather:

Following up on our call from earlier today, we wanted to confirm that you agreed that the 30b6 for PPST/PPSA/PPCC will take place on Nov 17 with Nov 18 as a spill over date if needed.

I'm not authorized at this point to accept service for Marianne DeJong.

See below for deposition locations. Note that we are still confirming that Kreager Mitchell has sufficient available conference room space. We know you want to issue new notices and would agree that if we have to change the location from Kreager Mitchell for the 2 depositions in San Antonio, you would not need to re-notice.

Nov 3: Hons (San Antonio), Kreager Mitchell, 7373 Broadway, San Antonio, TX 78209

Nov 10: Rossiter (DC) AP DC, 601 Massachusetts Ave., NW Washington, DC 20001

Nov 17: PPST/CC/SA (San Antonio) Kreager Mitchell, 7373 Broadway, San Antonio, TX 78209

Nov 21: Lambrecht (Austin), 303 Colorado Street, Suite 2750, Austin, TX 78701

Nov 22: Sokolow (Austin), 303 Colorado Street, Suite 2750, Austin, TX 78701

Dec 1: PPGC (Houston) AP Houston, 700 Louisiana Street, Suite 4000, Houston, TX 77002

Unfortunately, we have been unable to come up with an alternative date for Linton beyond the ones we previously offered. We would reiterate our offer to double track if you can take her deposition on December 8 in Houston. She is also available Dec 9, 10, or 16 in Houston. If you are willing to take her deposition remotely, Dec 5 may still be an option. Please let us know if you would be able to make any of these options work.

As discussed, please let us know Relator's availability Dec 1-9 for Relator's deposition and the location.

Finally, Defendants would like to depose Lochabay on Nov 29-Dec 2 or Dec 8-9. We assume the deposition will be in Austin per Ray's note from some time ago, but please let us know.

Thanks,
Tirzah

Tirzah Lollar
Partner | [Bio](#)

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Washington, DC 20001-3743
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Tirzah.Lollar@arnoldporter.com

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From: Andrew Stephens <andrew@hackerstephens.com>

Sent: Monday, October 24, 2022 5:35 PM

To: zzz.External.dashby@omm.com <[dashby@omm.com](mailto:zzz.External.dashby@omm.com)>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; zzz.External.lgodesky@omm.com <lgodesky@omm.com>; zzz.External.jchapa@omm.com <jchapa@omm.com>; zzz.External.asantella@omm.com <asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; zzz.External.rgalin@omm.com <rgalin@omm.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

Thank you, Danny.

Andrew

From: Ashby, Danny S. <ashby@omm.com>

Sent: Monday, October 24, 2022 3:20 PM

To: Andrew Stephens <andrew@hackerstephens.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Godesky, Leah <lgodesky@omm.com>; Chapa, Justin R. <jchapa@omm.com>; Santella, Amanda M. <asantella@omm.com>; Reeder-

Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; Galin, Ross B. <rgalin@omm.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Hi Andrew and Heather -

Following up on our call earlier today, we're still working on dates for Emily Stewart and Rosemary Collucio. For Rosemary, you asked us to look at December 9 in NY and we will do that.

Separately, I was mistaken about the location of Kim Custer's 30(b)(6) deposition. We will present her in DC on the 28th, which should be easier for everyone given that Vickie Barrow-Klein is also scheduled in DC on the 29th and 30th. And both of these depositions will be in our DC office. Thanks.

Danny

Danny S. Ashby
O: +1-972-360-1904
M: +1-214-577-9886
dashby@omm.com

From: Andrew Stephens <andrew@hackerstephens.com>

Sent: Thursday, October 20, 2022 11:25 AM

To: Ashby, Danny S. <dashby@omm.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Godesky, Leah <lgodesky@omm.com>; Chapa, Justin R. <jchapa@omm.com>; Santella, Amanda M. <asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; Galin, Ross B. <rgalin@omm.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

[EXTERNAL MESSAGE]

Danny, Tirzah,

Please let us know if this schedule will work for Defendants:

Nov 3: Hons (Austin/SA)
Nov 10: Rossiter (DC)
Nov 15: Trivisonno (FL)
Nov 17: PPST/CC/SA (Austin/SA)
Nov 21: Lambrecht (Austin)
Nov 22: Sokolow (Austin)

Nov 28: PPFA Custer (NY)
Nov 29: PPFA Barrow-Klein (DC)
Nov 30: Barrow-Klein (DC)
Dec 1: PPGC (Houston)
Dec 5: Linton (Houston)
Dec 6: PPGT (Austin/Dallas)
Dec 7: Dudney (Chicago)
Dec 8: Kramer (Chicago)

Andrew

From: Ashby, Danny S. <dashby@omm.com>
Sent: Wednesday, October 19, 2022 7:26 PM
To: Andrew Stephens <andrew@hackerstephens.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>
Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Godesky, Leah <lgodesky@omm.com>; Chapa, Justin R. <jchapa@omm.com>; Santella, Amanda M. <asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; Galin, Ross B. <rgalin@omm.com>
Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Hi Andrew -

Yes, Vickie would be in DC and Kim would be in NYC (or possibly Philadelphia if you'd prefer). Separately, we represent Emily Stewart and will work on dates for her -- and we will circle back soon on Rosemary Coluccio. Thanks.

Danny

Danny S. Ashby
O: +1-972-360-1904
M: +1-214-577-9886
dasbhy@omm.com

From: Andrew Stephens <andrew@hackerstephens.com>
Sent: Wednesday, October 19, 2022 5:55 PM
To: Ashby, Danny S. <dashby@omm.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>
Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Godesky, Leah <lgodesky@omm.com>; Chapa, Justin R. <jchapa@omm.com>; Santella, Amanda M. <asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; Galin, Ross B. <rgalin@omm.com>
Subject: [SUSPICIOUS MESSAGE] RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Thanks, Danny. Do you have proposed locations for Kim Custer and Vickie Barrow-Klein?

Andrew

From: Ashby, Danny S. <dashby@omm.com>

Sent: Wednesday, October 19, 2022 5:18 PM

To: Andrew Stephens <andrew@hackerstephens.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Godesky, Leah <lgodesky@omm.com>; Chapa, Justin R. <jchapa@omm.com>; Santella, Amanda M. <asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; Galin, Ross B. <rgalin@omm.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Hi Andrew -

Following up on this, we expect to have two 30(b)(6) witnesses -- Kim Custer and Vickie Barrow-Klein -- and you've asked for a fact witness deposition of Vickie. Kim is available November 21 or 22 and Vickie is available November 29 or 30. In response to your email about providing multiple dates for each witness, perhaps you can slot in the ones where the dates work on your end and get back to us where you need other dates so we're not canvassing the entire group again. Thanks.

Danny

Danny S. Ashby
O: +1-972-360-1904
M: +1-214-577-9886
dasbhy@omm.com

From: Ashby, Danny S.

Sent: Wednesday, October 19, 2022 11:18 AM

To: 'Andrew Stephens' <andrew@hackerstephens.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Godesky, Leah <lgodesky@omm.com>; Chapa, Justin R. <jchapa@omm.com>; Santella, Amanda M. <asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; Galin, Ross B. <rgalin@omm.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Hi Andrew -

We're working on the 30(b)(6) witness schedule and will get back to you ASAP on that -- as well as the two additional folks identified below. In the interim, based on the schedules we've confirmed so far, we would propose the following:

Teri Trivisonno - November 15 (Naples, FL)
Tamara Kramer - November 29 (Chicago)
Louis Dudney - December 9 (Chicago)

Louis has no availability on or before November 30, which is why we're proposing December 9. And, of course, we would agree that taking his deposition then would not affect the trial date or any other deadlines in the case.

Thanks.

Danny

Danny S. Ashby
O: +1-972-360-1904
M: +1-214-577-9886
dashby@omm.com

From: Andrew Stephens <andrew@hackerstephens.com>
Sent: Wednesday, October 19, 2022 11:03 AM
To: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>
Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Godesky, Leah <lgodesky@omm.com>; Ashby, Danny S. <dashby@omm.com>; Chapa, Justin R. <jchapa@omm.com>; Santella, Amanda M. <asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>
Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

[EXTERNAL MESSAGE]

Tirzah,

Thank you for sending proposed dates. Please let us know proposed dates for the PPFA Affiliate 30(b)(6) depositions so we can see how those will fit into the schedule. As you know, we noticed several of the 30(b)(6) depositions for the last week of November and would like to take those depositions at the end of the discovery period as noticed. Relator is generally available in November so we have some flexibility there. We also plan to subpoena Marianne DeJong unless you all will be representing her and can accept service.

Danny,

If you could provide proposed dates for the PPFA witnesses and the PPFA 30(b)(6) deposition that would help get the schedule nailed down. We also plan to subpoena Emily Stewart and Rosemary Coluccio unless you all will be representing them and can accept service.

Andrew

Andrew B. Stephens

Partner

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http://secure-web.cisco.com/1hBce3F6l49Oe_vp-yUv1ON03g0XI93BXf9dCCpfAqsl58mDcr09W4q6zxNIGt1y3FPO4d4oTj57tkoeheaYorHjN1rDRKJL463FRnWBkrlINGXmPAXy6WJWP0AvmO1wLpvJ_qEdiA-abKrSLyrDFpgmMe9uzPgpkLoOunJTvvIMZvSHZJMPI3fk7a07BqmnqSTNofB-enmc1Ag2GeegWisYtyQwGTNzYQ-qJfXvTFKlm8KY5j-Vgaa06ZH9grcJhfXFFXeFSIrVggWLC58-PuyLdWrzdpVgBBtFxTIL48qbrl4WlxAtvlrYlrFP4xEX2G_XbZfA7AyVh7UDjppw4ox4hQINCod-1lpQKZyxMdpV78FigPg2HyhoGSrX_XmpdrpcZKwE4E7N0S3NAdmdac-sKECqIV8lahLWLjQCryUcXBEXqAWthc3OKn3KWEc/http%3A%2F%2Fwww.hackerstephens.com

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From: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>

Sent: Tuesday, October 18, 2022 5:55 PM

To: Andrew Stephens <andrew@hackerstephens.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D.

<Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>;

lgodesky@omm.com; dashby@omm.com; jchapa@omm.com; asantella@omm.com; Reeder-Ricchetti, Emily

<Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C.

<Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Andrew and Ray:

Following up on our call from yesterday and the notices Plaintiffs sent before the parties could discuss scheduling, please let us know if the below dates will work for the depositions you have requested.

Jeffrey Hons - Nov 3 (Austin)

Lou Rossiter - Nov 10 or 17 (Washington, DC)

Ken Lambrecht - Nov 20 (Austin)

David Sokolow - Nov 22 (Austin)

Melaney Linton - Dec 9 (Houston) - Ms. Linton has no availability on or before Nov 30, so we had to propose a date just outside of the Nov 30 close of discovery. We would agree that taking her deposition on Dec 9 would have no impact on the trial date.

We are still working on dates and locations for the Affiliates' 30b6 depositions and will get back to you as soon as possible on them. But I did want to flag that Nov 1 will not work for the PPST 30b6 deposition.

PPFA will respond about their depositions.

Please also let us know if Nov 29 or 30 will work for the deposition of Relator. We assume that this deposition will take place in Austin (exact location to be determined by Defendants), but please confirm that Austin will work.

Thanks,
Tirzah

Tirzah Lollar
Partner | [Bio](#)

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From: Andrew Stephens <andrew@hackerstephens.com>

Sent: Thursday, October 13, 2022 7:54 PM

To: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Hussain, Murad S. <Murad.Hussain@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; zzz.External.lgodesky@omm.com <lgodesky@omm.com>; zzz.External.dashby@omm.com <dashby@omm.com>; zzz.External.jchapa@omm.com <jchapa@omm.com>; zzz.External.asantella@omm.com <asantella@omm.com>

Cc: Raymond Winter <Raymond.Winter@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

Thanks, Tirzah. Only change in these is the dates.

Andrew

From: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>

Sent: Thursday, October 13, 2022 6:43 PM

To: Andrew Stephens <andrew@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Hussain, Murad S. <Murad.Hussain@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; dashby@omm.com; jchapa@omm.com; asantella@omm.com

Cc: Raymond Winter <Raymond.Winter@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Andrew, we would like to speak with you about the 30b6 notices on Monday. I'm just checking availability on our side and will revert with a proposed timeframe.

Did anything thing change in these amended notices other than the dates?

Thanks

Tirzah Lollar
Partner | [Bio](#)

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From: Andrew Stephens <andrew@hackerstephens.com>

Sent: Thursday, October 13, 2022 7:40 PM

To: Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Hussain, Murad S. <Murad.Hussain@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; zzz.External.lgodesky@omm.com <lgodesky@omm.com>; zzz.External.dashby@omm.com <dashby@omm.com>; zzz.External.jchapa@omm.com <jchapa@omm.com>; zzz.External.asantella@omm.com <asantella@omm.com>

Cc: Raymond Winter <Raymond.Winter@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

Counsel:

Attached are Amended Notices of 30(b)(6) Depositions of PPFA, PPGT and PPGC. If you would like to discuss the dates or locations of these depositions, or the other depositions we have noticed, please let us know and we can schedule a call. Relator and the State are available anytime on Monday (10/17), Wednesday morning (10/19), or Thursday morning (10/20).

Best regards,

Andrew

From: Andrew Stephens

Sent: Tuesday, October 11, 2022 8:04 PM

To: Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Hussain, Murad S. <Murad.Hussain@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; dashby@omm.com; jchapa@omm.com; asantella@omm.com

Cc: Raymond Winter <Raymond.Winter@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Please see attached deposition notices. If you would like to discuss dates and locations please let us know and we can set up a call.

Andrew

Andrew B. Stephens
Partner

HACKERSTEPHENS_{LLP}

http://secure-web.cisco.com/1hBce3F6I49Oe_vp-yUv1ON03g0XI93BXF9dCCpfAqsl58mDcr09W4q6zxNIGt1y3FPO4d4oTj57tkoeheaYorHjN1rDRKJL463FRnWBkrlINGXmPAXy6WJWP0AvmO1wLpvJ_qEdiA-abKrSLyrDFpgmMe9uzPgpkLoOunJTvvIMZvSHZJMPI3fK7a07BqmnqSTNofB-enmc1Ag2GeegWisYtyQwGTNzYQ-qJfXvTFKlm8KY5j-Vgaa06ZH9grcJhfXFFXeFSrVggWLC58-PuyLdWrzdpVgBBtFxTIL48qbrl4WlxAtvIrYrFP4xEX2G_XbZfA7AyVh7UDjppw4ox4hQINCod-1lpQKZyxMdpV78FiqPg2HyhoGSrX_XmpdrpcZKwE4E7N0S3NAdmdac-sKECqIV8lahLWljQCryUcXBEXqAWthc3OKn3KWEc/http%3A%2F%2Fwww.hackerstephens.com

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From: Andrew Stephens

Sent: Thursday, September 1, 2022 12:07 PM

To: Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Hussain, Murad S. <Murad.Hussain@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; dashby@omm.com; jchapa@omm.com; asantella@omm.com

Cc: Raymond Winter <Raymond.Winter@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Attached are Relator's Sixth Requests for Production to PPFA and the PPFA Affiliates.

Andrew

Andrew B. Stephens

Partner

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http://secure-web.cisco.com/1hBce3F6I49Oe_vp-yUv1ON03g0XI93BXF9dCCpfAqsl58mDcr09W4q6zxNIGt1y3FPO4d4oTj57tkoeheaYorHjN1rDRKJL463FRnWBkrlINGXmPAXy6WJWP0AvmO1wLpvJ_qEdiA-abKrSLyrDFpgmMe9uzPgpkLoOunJTvvIMZvSHZJMPI3fK7a07BqmnqSTNofB-enmc1Ag2GeegWisYtyQwGTNzYQ-qJfXvTFKlm8KY5j-Vgaa06ZH9grcJhfXFFXeFSrVggWLC58-PuyLdWrzdpVgBBtFxTIL48qbrl4WlxAtvIrYrFP4xEX2G_XbZfA7AyVh7UDjppw4ox4hQINCod-1lpQKZyxMdpV78FiqPg2HyhoGSrX_XmpdrpcZKwE4E7N0S3NAdmdac-sKECqIV8lahLWljQCryUcXBEXqAWthc3OKn3KWEc/http%3A%2F%2Fwww.hackerstephens.com

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From: Andrew Stephens

Sent: Wednesday, August 31, 2022 10:30 PM

To: Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Hussain, Murad S. <Murad.Hussain@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; dashby@omm.com; jchapa@omm.com; asantella@omm.com

Cc: Raymond Winter <Raymond.Winter@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Attached are Relator's Fifth Requests for Production to the PPFA Affiliates.

Andrew

Andrew B. Stephens

Partner

HACKERSTEPHENS LLP

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From: Andrew Stephens

Sent: Tuesday, August 23, 2022 11:13 AM

To: Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Hussain, Murad S. <Murad.Hussain@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; dashby@omm.com; jchapa@omm.com; asantella@omm.com

Cc: Raymond Winter <Raymond.Winter@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Attached are Relator's Fourth Requests for Production to the PPFA Affiliates.

Andrew

Andrew B. Stephens

Partner

HACKERSTEPHENS LLP

http://secure-web.cisco.com/1hBce3F6l49Oe_vp-yUv1ON03g0XI93BXf9dCCpfAqsl58mDcr09W4q6zxNIGt1y3FPO4d4oTj57tkoeheaYorHjN1rDRKJLL463FRnWBkrlINGXmPAXy6WJWP0AvmO1wLpvJ_qEdiA-abKrSLyrDFpgmMe9uzPgpkLoOunJTvvIMZvSHZJMPI3fk7a07BqmngSTNofB-enmc1Ag2GeegWisYtyQwGTNzYQ-qJfXvTFKIm8KY5j-Vgao6ZH9grcJhfXFFXeFSlrVggWLC58-PuyLdWrzdpVgBBtFxTIL48qbrl4WlxAtvIrYrFP4xEX2G_XbZfA7AyVh7UDjppw4ox4hQINCod-1lpQKZyxMdpV78FigPg2HyhoGSrX_XmpdrpcZKwE4E7N0S3NAdmdac-sKECqIV8lahLWljQCryUcXBEXqAWthc3OKn3KWec/http%3A%2F%2Fwww.hackerstephens.com

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From: Andrew Stephens

Sent: Wednesday, August 3, 2022 4:18 PM

To: Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Hussain,

Murad S. <Murad.Hussain@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; dashby@omm.com; jchapa@omm.com; asantella@omm.com
Cc: Raymond Winter <Raymond.Winter@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>
Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Attached are Relator's Fifth Requests for Production to Defendant Planned Parenthood Federation of America, Inc.

Andrew

Andrew B. Stephens
Partner

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From: Andrew Stephens
Sent: Thursday, July 7, 2022 12:16 PM
To: Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Hussain, Murad S. <Murad.Hussain@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; dashby@omm.com; jchapa@omm.com; asantella@omm.com
Cc: Raymond Winter <Raymond.Winter@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>
Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Attached are Relator's Fourth Requests for Production to Defendant Planned Parenthood Federation of America, Inc., and Relator's Third Requests for Production to Defendants Planned Parenthood Gulf Coast, Inc., Planned Parenthood Greater Texas, Inc., Planned Parenthood South Texas, Inc., Planned Parenthood Cameron County, Inc., and Planned Parenthood San Antonio, Inc.

Andrew

Andrew B. Stephens
Partner

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http://secure-web.cisco.com/1hBce3F6I49Oe_vp-yUv1ON03g0XI93BXf9dCCpfAqsl58mDcr09W4q6zxNIGt1y3FPO4d4oTj57tkoeheaYorHjN1rDRKJL463FRnWBkrlINGXmPAXy6WJWP0AvmO1wLpvJ_qEdiA-abKrSLyrDFpgmMe9uzPgpkLoOunJTvvIMZvSHZJMPI3fK7a07BgmngSTNofB-enmc1Ag2GeegWisYtyQwGTNzYQ-qJfXvTFKIm8KY5j-Vgaa06ZH9grcJhfXFFXeFSrVggWLC58-PuyLdWrzdpVgBBtFxtIL48qbrl4WlxAtvlrYlrfP4xEX2G_XbZfA7AyVh7UDjppw4ox4hQINCod-1lpQKZyxMdpV78FigPg2HyhoGSrX_XmpdrpcZKwE4E7N0S3NAdmdac-sKECqIV8lahLWljQCryUcXBEXqAWthc3OKn3KWEc/http%3A%2F%2Fwww.hackerstephens.com

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From: Andrew Stephens

Sent: Thursday, June 16, 2022 4:12 PM

To: Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Hussain, Murad S. <Murad.Hussain@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; dashby@omm.com; jchapa@omm.com; asantella@omm.com

Cc: Raymond Winter <Raymond.Winter@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Attached are Relator's Third Requests for Production to Defendant Planned Parenthood Federation of America, Inc., and Relator's Second Requests for Production to Defendants Planned Parenthood Gulf Coast, Inc., Planned Parenthood Greater Texas, Inc., Planned Parenthood South Texas, Inc., Planned Parenthood Cameron County, Inc., and Planned Parenthood San Antonio, Inc.

Andrew

Andrew B. Stephens
Partner

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From: Andrew Stephens

Sent: Thursday, June 2, 2022 10:54 PM

To: Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Hussain, Murad S. <Murad.Hussain@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; dashby@omm.com; jchapa@omm.com; asantella@omm.com

Cc: Raymond Winter <Raymond.Winter@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Attached are Relator's Second Requests for Production to Defendant Planned Parenthood Federation of America, Inc.

Andrew

Andrew B. Stephens

Partner

HACKERSTEPHENS^{LLP}

http://secure-web.cisco.com/1hBce3F6I49Oe_vp-yUv1ON03g0XI93BXF9dCCpfAqsl58mDcr09W4q6zxNIGt1y3FPO4d4oTj57tkoeheaYorHjN1rDRKJL463FRnWBkrlINGXmPAXy6WJWP0AvmO1wLpvJ_qEdiA-abKrSLyrDFpgmMe9uzPgpkLoOunJTvvlMZvSHZJMPI3fK7a07BqmnqSTNofB-enmc1Aq2GeegWisYtyQwGTNzYQ-qJfXvTFKIm8KY5j-Vgaa06ZH9grcJhfXFFXeFSlrVggWlc58-PuyLdWrzdpVgBBtFxTIL48qbrl4WlxAtvIrYlrFP4xEX2G_XbZfA7AyVh7UDjppw4ox4hQINCod-1lpQKZyxMdpV78FigPg2HyhoGSrX_XmpdrpcZKwE4E7N0S3NAdmdac-sKECqIV8lahLWljQCryUcXBEXqAWthc3OKn3KWEc/http%3A%2F%2Fwww.hackerstephens.com

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From: Andrew Stephens

Sent: Friday, May 27, 2022 11:51 PM

To: Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Hussain, Murad S. <Murad.Hussain@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>

Cc: Raymond Winter <Raymond.Winter@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>

Subject: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Attached are Relator's First Interrogatories and Requests for Production to Defendants.

Andrew

Andrew B. Stephens

Partner

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<http://www.arnoldporter.com>

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

United States of America
ex rel. ALEX DOE, Relator,

The State of Texas
ex rel. ALEX DOE, Relator,

The State of Louisiana
ex rel. ALEX DOE, Relator,

Plaintiffs,

V.

Planned Parenthood Federation of America, Inc.,
Planned Parenthood Gulf Coast, Inc., Planned
Parenthood of Greater Texas, Inc., Planned
Parenthood South Texas, Inc., Planned Parenthood
Cameron County, Inc., Planned Parenthood San
Antonio, Inc..

Defendants.

CIVIL ACTION NO. 2:21-CV-
00022-Z

Date: October 31, 2022

**DEFENDANTS' NOTICE OF 30(b)(6) DEPOSITION OF LOUISIANA DEPARTMENT
OF HEALTH**

Please take notice that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Defendants Planned Parenthood Gulf Coast, Inc. (“PPGC”), Planned Parenthood of Greater Texas, Inc. (“PPGT”), Planned Parenthood South Texas, Inc. (“PPST”), Planned Parenthood San Antonio, Inc. (“PPSA”), Planned Parenthood Cameron County (“PPCC”) (collectively, “Affiliate Defendants”) and Planned Parenthood Federation of America, Inc. (“PPFA”) will take the deposition of the Louisiana Department of Health (“LDH”) on December 9, 2022, beginning

at 9:00 a.m., at the office of Chehardy Sherman Williams, One Galleria Blvd., Suite 1100, Metairie, LA 70001. The deposition will be stenographically and electronically recorded and will be videotaped. The deposition will be used for discovery and/or evidentiary purposes to the full extent allowed by the Federal Rules of Civil Procedure and the Federal Rules of Evidence.

As used in this Notice, the term “Defendants” refers to PPGC, PPGT, PPST, PPSA, PPCC, and PPFA. As used in this Notice, the term “LDH” refers to the Louisiana Department of Health and the Louisiana Department of Health and Hospitals. Unless otherwise noted, the relevant time period for each topic is January 2010 to January 2022.

Pursuant to Rule 30(b)(6), LDH shall designate one or more individuals to testify as to all information reasonably available to LDH concerning the following subjects:

1. LDH’s knowledge and understanding of Louisiana Medicaid including:
 - a. the Louisiana Medicaid Provider Manual;
 - b. Louisiana Medicaid Provider Agreements; and
 - c. Louisiana Medicaid enrollment and participation requirements;
2. LDH’s knowledge and understanding of the administration of Louisiana Medicaid, including but not limited to:
 - a. The process by which claims submitted by providers for Louisiana Medicaid patients covered by a “fee for service” Medicaid plan are submitted to and paid by LDH;
 - b. The process by which LDH contracts with Managed Care Organizations (“MCOs”) and determines the capitated amounts it will pay to each MCO;
 - c. The process by which LDH collects encounter data from MCOs and how that data is used by LDH;
3. LDH’s knowledge and understanding of the Defendants’ participation in Louisiana Medicaid, including but not limited to:
 - a. each Defendant’s enrollment in Louisiana Medicaid;

- b. each Defendant's provider status in Louisiana Medicaid;
 - c. any documentation reflecting each Defendant's provider status in Louisiana Medicaid, including but not limited to approved provider lists provided to MCOs;
 - d. each Defendant's submission of claims for reimbursement to Louisiana Medicaid;
 - e. whether PPST, PPGT, PPCC, PPST, or PPFA ever submitted claims for reimbursement to Louisiana Medicaid;
 - f. communications between Louisiana Medicaid and each Defendant; and
 - g. whether PPGC was ever terminated from Louisiana Medicaid;
4. Communications between LDH and PPGC regarding whether PPGC was engaged in the donation or sale of fetal tissue and a video made on April 9, 2015 at a PPGC facility, including but not limited to:
- a. July 15, 2015 letter from LDH Secretary Kathy Kliebert to PPGC CEO Melaney Linton;
 - b. July 28, 2015 letter from Linton to Kliebert;
 - c. August 4, 2015 letter from Kliebert to Linton; and
 - d. August 15, 2015 letter from Linton to Kliebert;
5. The LDH August 2015 decision to initiate termination proceedings pursuant to La. R.S. 46:437.11(D)(1) against one or more of the Affiliate Defendants, including but not limited to the:
- a. Basis for the decision;
 - b. Information from non-LDH employees on which LDH relied in making its decision or with whom LDH consulted in making its decision;
 - c. Communications between LDH and employees of the State of Louisiana regarding LDH's consideration and ultimate decision to initiate termination proceedings; and
 - d. The identities of the LDH employees involved in the decision;
6. The September 2015 LDH decision to rescind the termination notices issued to one or more of the Affiliate Defendants in August 2015, including but not limited to the:
- a. Basis for the decision;

- b. Information from non-LDH employees on which LDH relied in making its decision or with whom LDH consulted in making its decision;
 - c. Communications between LDH and employees of the State of Louisiana regarding LDH's consideration and ultimate decision to rescind termination proceedings; and
 - d. The identities of the LDH employees involved in the decision;
- 7. The LDH September 2015 decision to initiate termination proceedings pursuant to La. R.S. 46:437.11 and 46:437.14 against one or more of the Affiliate Defendants, including but not limited to the:
 - a. Basis for the decision;
 - b. Information from non-LDH employees on which LDH relied in making its decision or with whom LDH consulted in making its decision;
 - c. Communications between LDH and employees of the State of Louisiana regarding LDH's consideration and ultimate decision to initiate termination proceedings; and
 - d. The identities of the LDH employees involved in the decision;
- 8. The LDH initiation of termination proceedings in August and September 2015 against one or more of the Affiliate Defendants, litigation in federal and state courts concerning termination of one or more of the Affiliate Defendants from Louisiana Medicaid, including but not limited to the:
 - a. Basis for the termination proceedings; and
 - b. The identities of the LDH employees involved in the termination proceedings;
- 9. LDH's knowledge and understanding of:
 - a. The requirements of fetal transplantation research found in 42 U.S.C. §§ 289g, 289g-1, and 289g-2; and
 - b. The ethical standards at issue in research involving fetal and placental tissue;
- 10. LDH's knowledge and understanding of the "free choice of provider" requirements specified in section 1902(a)(23) of the Social Security Act, including whether the termination of the Affiliate Defendants violated the free choice of provider requirements;

11. LDH's knowledge and understanding of the procedure for terminating a provider from Louisiana Medicaid, including but not limited to any requirements that notice must be provided to Louisiana Medicaid Managed Care Organizations regarding the termination;
12. LDH's knowledge and understanding of the potential Medicaid sanctions under Louisiana Administrative Code Title 50, sections 4145 and 4161, including the State of Louisiana's policies and procedures for investigating potential Medicaid violations to determine what, if any, sanction is appropriate;
13. LDH's knowledge and understanding of recoupment and/or recovery of overpayments including:
 - a. LDH's knowledge and understanding of the definition of overpayment under Louisiana Administrative Code Title 50;
 - b. LDH's knowledge and understanding of the recoupment process; and
 - c. Efforts by LDH, the Office of the Attorney General's Medicaid Fraud Control Unit, or any other agency in the State of Louisiana to obtain recoupment of overpayments;
14. LDH's authority to refer suspected fraud and abuse to the Office of the Attorney General's Medicaid Fraud Control Unit under the Louisiana Administrative Code, including LDH's knowledge and understanding of such authority, whether it exercised such authority with respect to any of the Affiliate Defendants, and the LDH employees who were involved in deciding whether or not to make the referral;
15. LDH's knowledge and understanding of any Medicaid fraud investigations of any of the Affiliate Defendants (including but not limited to the "ongoing investigation" referenced in Kleibert's August 4, 2015 letter to Linton, and the "investigations of PPGC by both DHH and the Louisiana Office of Inspector General" referenced in the September 15, 2015 termination notices to PPGC) conducted by any agency of the State of Louisiana, including but not limited to the dates, allegations, subjects, targets, persons involved in conducting the investigations, final reports issued, and outcomes of any such Medicaid fraud investigations;
16. Any efforts made by LDH to determine whether any Louisiana Medicaid Providers have engaged in fetal tissue procurement or donation that might render the provider unqualified to provide medical services under Louisiana Medicaid or violate generally accepted medical standards or ethical standards, including but not limited to:
 - a. whether any providers that were identified were terminated from Louisiana Medicaid;

- b. whether any providers that were identified were asked or required to repay amounts reimbursed under Louisiana Medicaid; and
 - c. whether any amounts were repaid;
- 17. Circumstances under which LDH terminated a Louisiana Medicaid Provider other than PPGC on the basis that:
 - a. The provider entered into a federal False Claims Act settlement in connection with conduct unrelated to the provider's provision of services under Louisiana Medicaid (see LDH September 2015 notice of termination);
 - b. The provider did not adhere to its affirmative duty to provide written notice within 10 working days to LDH that the provider had entered into a federal False Claims Act settlement in connection with conduct unrelated to the provider's provision of services under Louisiana Medicaid (see LDH September 2015 notice of termination);
 - c. The provider's agents, affiliates, or providers-in-fact were subject to provider audits or federal false claims cases (see LDH September 2015 notice of termination);
 - d. The provider misrepresented its actions in response to an investigation initiated by either LDH or the Louisiana Office of Inspector General (see LDH September 2015 notice of termination); and
 - e. The provider engages in or follows a policy of agreeing to engage in fetal tissue procurement or donation;
- 18. LDH's knowledge and understanding of any requests or demands from LDH, the Louisiana Attorney General's Office, the Medicaid Fraud Control Unit, or any other agency in the State of Louisiana that PPGC repay amounts PPGC had received from Louisiana Medicaid during the pendency of the injunction entered by the U.S. District Court for the Middle District of Louisiana in *Planned Parenthood Gulf Coast, Inc. v. Kliebert*, No. 3:15-cv-565-JWD-SCR;
- 19. LDH's consideration of whether PPGC had an obligation or would be required to repay amounts received for Medicaid services provided;
- 20. LDH's knowledge and understanding of the Louisiana Attorney General's Office's, the Medicaid Fraud Control Unit's, or any other agency in the State of Louisiana's consideration of whether any PPGC had an obligation or would be required to repay amounts received for Medicaid services provided;

21. LDH's consideration of whether Medicaid, Texas Medicaid, and/or Louisiana Medicaid could or should seek recoupment of amounts reimbursed to PPGC;
22. LDH's knowledge and understanding of the Louisiana Attorney General's Office's, the Medicaid Fraud Control Unit's, or any other agency in the State of Louisiana's consideration of whether Medicaid, Texas Medicaid, and/or Louisiana Medicaid could or should seek recoupment of amounts reimbursed to PPGC;
23. Any notices provided by LDH to Louisiana Medicaid Managed Care Organizations that PPGC had been terminated from Louisiana Medicaid;
24. Any notices provided by LDH to Louisiana Medicaid Managed Care Organizations that PPGC could no longer accept new Medicaid clients;
25. LDH's requests that a Louisiana Medicaid provider repay amounts received under a federal court injunction prohibiting the provider's termination from Louisiana Medicaid;
26. LDH's decision not to initiate administrative recoupment proceedings to recover amounts paid to a Louisiana Medicaid provider under a federal court injunction prohibiting the provider's termination from Louisiana Medicaid;
27. Providers other than PPGC that LDH has terminated "for similar violations of" La R.S. 46:437.11 and 46:437.14 as mentioned in a September 27, 2016 email from LDH Deputy General Counsel to Vicki Wachino, CMS Director, including but not limited to for each provider:
 - a. date of the termination;
 - b. reason for the termination;
 - c. date of the conduct that resulted in the termination;
 - d. whether the provider was asked or obligated to return any amounts reimbursed under Medicaid or Louisiana Medicaid;
 - e. whether the provider did return any amounts reimbursed under Medicaid or Louisiana Medicaid; and
 - f. the amount of any reimbursements that were returned;
28. LDH's knowledge and understanding of any Louisiana Medical Assistance Programs Integrity Law actions brought by Louisiana based on alleged failure to repay funds received under a federal court injunction prohibiting the provider's termination from Louisiana Medicaid;

29. LDH's communications and dealings with Relator, including but not limited to:
 - a. When LDH first had contact (if any) with Relator, the Center for Medical Progress, or third parties acting on Relator's behalf regarding allegations of potential misconduct by any of the Affiliate Defendants;
 - b. Information or documents provided by Relator, the Center for Medical Progress, or third parties acting on Relator's behalf regarding potential misconduct by any of the Affiliate Defendants; and
 - c. Any information or documents requested or received from Relator relating to any of the Affiliate Defendants;
30. LDH's communications and dealings with the Louisiana Office of the Attorney General, including but not limited to the Office of the Attorney General's Medicaid Fraud Control Unit, regarding potential misconduct by any of the Affiliate Defendants;
31. LDH's communications and dealings with the U.S. Department of Health & Human Services, Centers for Medicare and Medicaid Services, regarding
 - a. potential misconduct by any of the Affiliate Defendants;
 - b. the facts that form the basis for Louisiana's termination of any of the Affiliate Defendants from Louisiana Medicaid; and
 - c. whether Louisiana's termination of any of the Affiliate Defendants from Louisiana Medicaid violated the "free choice of provider" requirements specified in section 1902(a)(23) of the Social Security Act.

/s/ Tirzah S. Lollar

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Cameron County, Inc., and Planned
Parenthood San Antonio, Inc.*

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*Attorneys for Defendant Planned Parenthood
Federation of America, Inc.*

October 31, 2022

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Notice of Rule 30(b)(6) Deposition of the Louisiana Department of Health by Defendants has been served upon all attorneys of record in this case on this, the 31st day of October, 2022, by electronic email.

s/ Tirzah S. Lollar

Tirzah S. Lollar

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

United States of America	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	CIVIL ACTION NO. 2:21-CV-
	§	00022-Z
The State of Texas	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	
	§	
The State of Louisiana	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	
Plaintiffs,	§	
v.	§	
Planned Parenthood Federation of America, Inc.,	§	
Planned Parenthood Gulf Coast, Inc., Planned	§	
Parenthood of Greater Texas, Inc., Planned	§	
Parenthood South Texas, Inc., Planned Parenthood	§	
Cameron County, Inc., Planned Parenthood San	§	
Antonio, Inc.,	§	
Defendants.		

DEFENDANTS' NOTICE OF ORAL DEPOSITION OF DONALD E. LOCHABAY, JR.

PLEASE TAKE NOTICE that pursuant to Rule 30 of the Federal Rules of Civil Procedure, Defendants, by and through their attorneys, will take the oral and videotaped deposition of:

Witness: Donald E. Lochabay, Jr.

Date: December 8, 2022

Time: 9:00 a.m. (CST)

Location: Offices of Alvarez & Marsal
2100 Ross Avenue, 21st Floor
Dallas, Texas 75201

The deposition will be taken upon oral examination before a certified court reporter authorized by law to take depositions upon oral examination and will be stenographically and electronically recorded and will be videotaped. The oral examination will be taken pursuant to Federal Rules of Civil Procedure and is being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the Local Rules of the Court, the Federal Rules of Civil Procedure, and/or the Federal Rules of Evidence.

Said deposition will commence at the time stated above and will continue from day to day until completed, Sundays and Holidays excluded. Said deposition will be taken by a certified shorthand reporter and Notary Public or such other person authorized to administer oaths.

Defendants reserve all rights regarding any documents or other written discovery that have not been timely provided in advance of depositions, including the right to question each witness about such materials at a later date.

Dated: October 31, 2022

Respectfully submitted,
ARNOLD & PORTER KAYE SCHOLER LLP

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Attorneys for Defendant Planned Parenthood Federation of America, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2022, the foregoing document was served on all counsel of record via e-mail.

/s/ Tirzah S. Lollar

Tirzah S. Lollar

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

United States of America	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	CIVIL ACTION NO. 2:21-CV-
	§	00022-Z
The State of Texas	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	
	§	
The State of Louisiana	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	
Plaintiffs,	§	
v.	§	
Planned Parenthood Federation of America, Inc.,	§	
Planned Parenthood Gulf Coast, Inc., Planned	§	
Parenthood of Greater Texas, Inc., Planned	§	
Parenthood South Texas, Inc., Planned Parenthood	§	
Cameron County, Inc., Planned Parenthood San	§	
Antonio, Inc.,	§	
Defendants.		

**DEFENDANTS' NOTICE OF ORAL
DEPOSITION OF DAVID MAXWELL**

PLEASE TAKE NOTICE that pursuant to Rule 30 of the Federal Rules of Civil Procedure, Defendants, by and through their attorneys, will take the oral and videotaped deposition of:

Witness: David Maxwell

Date: December 9, 2022

Time: 9:30 a.m. (CST)

Location: Office of the Attorney General
300 West 15th Street
Austin, TX 78701

The deposition will be taken upon oral examination before a certified court reporter authorized by law to take depositions upon oral examination and will be stenographically and electronically recorded and will be videotaped. The oral examination will be taken pursuant to Federal Rules of Civil Procedure and is being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the Local Rules of the Court, the Federal Rules of Civil Procedure, and/or the Federal Rules of Evidence.

Said deposition will commence at the time stated above and will continue from day to day until completed, Sundays and Holidays excluded. Said deposition will be taken by a certified shorthand reporter and Notary Public or such other person authorized to administer oaths, at the place where the deposition is taking place or, should the deposition be undertaken remotely, will participate and administer the oath remotely.

Defendants reserve all rights regarding any documents or other written discovery that have not been timely provided in advance of depositions, including the right to question each witness about such materials at a later date.

Dated: October 31, 2022

Respectfully submitted,
ARNOLD & PORTER KAYE SCHOLER LLP

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Attorneys for Defendant Planned Parenthood Federation of America, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2022, the foregoing document was served on all counsel of record via e-mail.

/s/ Tirzah S. Lollar

Tirzah S. Lollar

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

United States of America	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	CIVIL ACTION NO. 2:21-CV-
	§	00022-Z
The State of Texas	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	
	§	
The State of Louisiana	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	
Plaintiffs,	§	
v.	§	
Planned Parenthood Federation of America, Inc.,	§	
Planned Parenthood Gulf Coast, Inc., Planned	§	
Parenthood of Greater Texas, Inc., Planned	§	
Parenthood South Texas, Inc., Planned Parenthood	§	
Cameron County, Inc., Planned Parenthood San	§	
Antonio, Inc.,	§	
Defendants.		

**DEFENDANTS' NOTICE OF ORAL
DEPOSITION OF KAY GHahremani**

PLEASE TAKE NOTICE that pursuant to Rule 30 of the Federal Rules of Civil Procedure, Defendants, by and through their attorneys, will take the oral and videotaped deposition of:

Witness: Kay Ghahremani

Date: November 22, 2022

Time: 9:30 a.m. (CST)

Location: O'Melveny & Meyers LLP
303 Colorado St., Suite 2750
Austin, TX 78701

The deposition will be taken upon oral examination before a certified court reporter authorized by law to take depositions upon oral examination and will be stenographically and electronically recorded and will be videotaped. The oral examination will be taken pursuant to Federal Rules of Civil Procedure and is being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the Local Rules of the Court, the Federal Rules of Civil Procedure, and/or the Federal Rules of Evidence.

Said deposition will commence at the time stated above and will continue from day to day until completed, Sundays and Holidays excluded. Said deposition will be taken by a certified shorthand reporter and Notary Public or such other person authorized to administer oaths, at the place where the deposition is taking place or, should the deposition be undertaken remotely, will participate and administer the oath remotely.

Defendants reserve all rights regarding any documents or other written discovery that have not been timely provided in advance of depositions, including the right to question each witness about such materials at a later date.

Dated: October 31, 2022

Respectfully submitted,
ARNOLD & PORTER KAYE SCHOLER LLP

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Texas, Inc., Planned Parenthood of South Texas, Inc., Planned Parenthood Cameron County, Inc., and Planned Parenthood San Antonio, Inc.

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Attorneys for Defendant Planned Parenthood Federation of America, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2022, the foregoing document was served on all counsel of record via e-mail.

/s/ Tirzah S. Lollar

Tirzah S. Lollar

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

United States of America	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	CIVIL ACTION NO. 2:21-CV-
	§	00022-Z
The State of Texas	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	
	§	
The State of Louisiana	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	
Plaintiffs,	§	
v.	§	
Planned Parenthood Federation of America, Inc.,	§	
Planned Parenthood Gulf Coast, Inc., Planned	§	
Parenthood of Greater Texas, Inc., Planned	§	
Parenthood South Texas, Inc., Planned Parenthood	§	
Cameron County, Inc., Planned Parenthood San	§	
Antonio, Inc.,	§	
Defendants.		

**DEFENDANTS' NOTICE OF ORAL
DEPOSITION OF KIM SULLIVAN**

PLEASE TAKE NOTICE that pursuant to Rule 30 of the Federal Rules of Civil Procedure, Defendants, by and through their attorneys, will take the oral and videotaped deposition of:

Witness: Kim Sullivan

Date: December 7, 2022

Time: 9:30 a.m. (CST)

Location: Chehardy Sherman Williams
1 Galleria Blvd., Suite 1100
Metairie, LA 70001

The deposition will be taken upon oral examination before a certified court reporter authorized by law to take depositions upon oral examination and will be stenographically and electronically recorded and will be videotaped. The oral examination will be taken pursuant to Federal Rules of Civil Procedure and is being taken for the purpose of discovery, for use at trial,

or for such other purposes as are permitted under the Local Rules of the Court, the Federal Rules of Civil Procedure, and/or the Federal Rules of Evidence.

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Defendants reserve all rights regarding any documents or other written discovery that have not been timely provided in advance of depositions, including the right to question each witness about such materials at a later date.

Dated: October 31, 2022

Respectfully submitted,
ARNOLD & PORTER KAYE SCHOLER LLP

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Attorneys for Defendant Planned Parenthood Federation of America, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2022, the foregoing document was served on all counsel of record via e-mail.

/s/ Tirzah S. Lollar

Tirzah S. Lollar

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

United States of America	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	CIVIL ACTION NO. 2:21-CV-
	§	00022-Z
The State of Texas	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	
	§	
The State of Louisiana	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	
Plaintiffs,	§	
v.	§	
Planned Parenthood Federation of America, Inc.,	§	
Planned Parenthood Gulf Coast, Inc., Planned	§	
Parenthood of Greater Texas, Inc., Planned	§	
Parenthood South Texas, Inc., Planned Parenthood	§	
Cameron County, Inc., Planned Parenthood San	§	
Antonio, Inc.,	§	
Defendants.		

**DEFENDANTS' NOTICE OF ORAL
DEPOSITION OF RELATOR ALEX DOE**

PLEASE TAKE NOTICE that pursuant to Rule 30 of the Federal Rules of Civil Procedure, Defendants, by and through their attorneys, will take the oral and videotaped deposition of:

Witness: Relator Alex Doe

Date: December 2, 2022

Time: 9:30 a.m. (CST)

Location: Offices of Arnold & Porter Kaye Scholer LLP
700 Louisiana St. Suite 4000 (Floor 40)
Houston, Texas 77002

The deposition will be taken upon oral examination before a certified court reporter authorized by law to take depositions upon oral examination and will be stenographically and electronically recorded and will be videotaped. The oral examination will be taken pursuant to Federal Rules of Civil Procedure and is being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the Local Rules of the Court, the Federal Rules of Civil Procedure, and/or the Federal Rules of Evidence.

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Dated: October 31, 2022

Respectfully submitted,
ARNOLD & PORTER KAYE SCHOLER LLP

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Texas, Inc., Planned Parenthood of South Texas, Inc., Planned Parenthood Cameron County, Inc., and Planned Parenthood San Antonio, Inc.

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CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2022, the foregoing document was served on all counsel of record via e-mail.

/s/ Tirzah S. Lollar

Tirzah S. Lollar

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

United States of America	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	CIVIL ACTION NO. 2:21-CV-
	§	00022-Z
The State of Texas	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	
	§	
The State of Louisiana	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	
Plaintiffs,	§	
v.	§	
Planned Parenthood Federation of America, Inc.,	§	
Planned Parenthood Gulf Coast, Inc., Planned	§	
Parenthood of Greater Texas, Inc., Planned	§	
Parenthood South Texas, Inc., Planned Parenthood	§	
Cameron County, Inc., Planned Parenthood San	§	
Antonio, Inc.,	§	
Defendants.		

**DEFENDANTS' NOTICE OF ORAL
DEPOSITION OF STUART BOWEN**

PLEASE TAKE NOTICE that pursuant to Rule 30 of the Federal Rules of Civil Procedure, Defendants, by and through their attorneys, will take the oral and videotaped deposition of:

Witness: Stuart Bowen

Date: December 6, 2022

Time: 9:30 a.m. (CST)

Location: Office of the Attorney General
 300 West 15th Street
 Austin, TX 78701

The deposition will be taken upon oral examination before a certified court reporter authorized by law to take depositions upon oral examination and will be stenographically and electronically recorded and will be videotaped. The oral examination will be taken pursuant to Federal Rules of Civil Procedure and is being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the Local Rules of the Court, the Federal Rules of Civil Procedure, and/or the Federal Rules of Evidence.

Said deposition will commence at the time stated above and will continue from day to day until completed, Sundays and Holidays excluded. Said deposition will be taken by a certified shorthand reporter and Notary Public or such other person authorized to administer oaths, at the place where the deposition is taking place or, should the deposition be undertaken remotely, will participate and administer the oath remotely.

Defendants reserve all rights regarding any documents or other written discovery that have not been timely provided in advance of depositions, including the right to question each witness about such materials at a later date.

Dated: October 31, 2022

Respectfully submitted,
ARNOLD & PORTER KAYE SCHOLER LLP

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CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2022, the foregoing document was served on all counsel of record via e-mail.

/s/ Tirzah S. Lollar

Tirzah S. Lollar

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

United States of America	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	CIVIL ACTION NO. 2:21-CV-
	§	00022-Z
The State of Texas	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	
	§	
The State of Louisiana	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	
Plaintiffs,	§	
v.	§	
Planned Parenthood Federation of America, Inc.,	§	
Planned Parenthood Gulf Coast, Inc., Planned	§	
Parenthood of Greater Texas, Inc., Planned	§	
Parenthood South Texas, Inc., Planned Parenthood	§	
Cameron County, Inc., Planned Parenthood San	§	
Antonio, Inc.,	§	
Defendants.		

**DEFENDANTS' NOTICE OF ORAL
DEPOSITION OF STEVE RUSSO**

PLEASE TAKE NOTICE that pursuant to Rule 30 of the Federal Rules of Civil Procedure, Defendants, by and through their attorneys, will take the oral and videotaped deposition of:

Witness: Steve Russo

Date: December 8, 2022

Time: 9:30 a.m. (CST)

Location: Chehardy Sherman Williams
1 Galleria Blvd., Suite 1100
Metairie, LA 70001

The deposition will be taken upon oral examination before a certified court reporter authorized by law to take depositions upon oral examination and will be stenographically and electronically recorded and will be videotaped. The oral examination will be taken pursuant to Federal Rules of Civil Procedure and is being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the Local Rules of the Court, the Federal Rules of Civil Procedure, and/or the Federal Rules of Evidence.

Said deposition will commence at the time stated above and will continue from day to day until completed, Sundays and Holidays excluded. Said deposition will be taken by a certified shorthand reporter and Notary Public or such other person authorized to administer oaths, at the place where the deposition is taking place or, should the deposition be undertaken remotely, will participate and administer the oath remotely.

Defendants reserve all rights regarding any documents or other written discovery that have not been timely provided in advance of depositions, including the right to question each witness about such materials at a later date.

Dated: October 31, 2022

Respectfully submitted,
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Attorneys for Defendant Planned Parenthood Federation of America, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2022, the foregoing document was served on all counsel of record via e-mail.

/s/ Tirzah S. Lollar

Tirzah S. Lollar

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

United States of America	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	CIVIL ACTION NO. 2:21-CV-
	§	00022-Z
The State of Texas	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	
	§	
The State of Louisiana	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	
Plaintiffs,	§	
v.	§	
Planned Parenthood Federation of America, Inc.,	§	
Planned Parenthood Gulf Coast, Inc., Planned	§	
Parenthood of Greater Texas, Inc., Planned	§	
Parenthood South Texas, Inc., Planned Parenthood	§	
Cameron County, Inc., Planned Parenthood San	§	
Antonio, Inc.,	§	
Defendants.		

**DEFENDANTS' NOTICE OF ORAL
DEPOSITION OF TED SPEARS**

PLEASE TAKE NOTICE that pursuant to Rule 30 of the Federal Rules of Civil Procedure, Defendants, by and through their attorneys, will take the oral and videotaped deposition of:

Witness: Ted Spears

Date: December 7, 2022

Time: 9:30 a.m. (CST)

Location: Office of the Attorney General
300 West 15th Street
Austin, TX 78701

The deposition will be taken upon oral examination before a certified court reporter authorized by law to take depositions upon oral examination and will be stenographically and electronically recorded and will be videotaped. The oral examination will be taken pursuant to Federal Rules of Civil Procedure and is being taken for the purpose of discovery, for use at trial,

or for such other purposes as are permitted under the Local Rules of the Court, the Federal Rules of Civil Procedure, and/or the Federal Rules of Evidence.

Said deposition will commence at the time stated above and will continue from day to day until completed, Sundays and Holidays excluded. Said deposition will be taken by a certified shorthand reporter and Notary Public or such other person authorized to administer oaths, at the place where the deposition is taking place or, should the deposition be undertaken remotely, will participate and administer the oath remotely.

Defendants reserve all rights regarding any documents or other written discovery that have not been timely provided in advance of depositions, including the right to question each witness about such materials at a later date.

Dated: October 31, 2022

Respectfully submitted,
ARNOLD & PORTER KAYE SCHOLER LLP

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CERTIFICATE OF SERVICE

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/s/ Tirzah S. Lollar

Tirzah S. Lollar

Exhibit 02

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

UNITED STATES OF AMERICA, §

ex rel. ALEX DOE, Relator, §

THE STATE OF TEXAS, §

ex rel. ALEX DOE, Relator, §

THE STATE OF LOUISIANA, §

ex rel. ALEX DOE, Relator, §

Plaintiffs, §

v. §

Civil Action No. 2:21-CV-00022-Z

PLANNED PARENTHOOD §

FEDERATION OF AMERICA, INC., §

PLANNED PARENTHOOD GULF §

COAST, INC., PLANNED §

PARENTHOOD OF GREATER §

TEXAS, INC., PLANNED §

PARENTHOOD SOUTH §

TEXAS, INC., PLANNED §

PARENTHOOD CAMERON §

COUNTY, INC., PLANNED §

PARENTHOOD SAN ANTONIO, §

INC., §

Defendants. §

**PLAINTIFFS' AMENDED NOTICE OF DEPOSITION OF TAMARA
KRAMER**

Please take notice that pursuant to Rule 30 of the Federal Rules of Civil Procedure, Plaintiffs will take the deposition of Tamara Kramer on December 8, 2022, beginning at 9:00 a.m., at 8770 West Bryn Mayr Avenue, Suite 1300, Chicago, Illinois 60631. The deposition will be stenographically and electronically recorded and will

be videotaped. The deposition will be used for discovery and/or evidentiary purposes to the full extent allowed by the Federal Rules of Civil Procedure and the Federal Rules of Evidence.

Respectfully submitted.

/s/ Andrew B. Stephens
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Attorneys for Relator

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I hereby certify that on October 25, 2022, this document was served on all counsel of record via email.

/s/ Andrew B. Stephens
Andrew B. Stephens